

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DAVID AMBROSE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

BOSTON GLOBE MEDIA PARTNERS, LLC,

Defendant.

Civil Action No. 22-cv-10195-RGS

**DECLARATION OF DAVID AMBROSE IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT
AND MOTION FOR ATTORNEYS' FEES**

I, David Ambrose, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of California. I am a Class Representative in the lawsuit entitled *Ambrose v. Boston Globe Media Partners, LLC*, Case No. 22-cv-10195-RGS, currently pending in the United States District Court for the District of Massachusetts. I make this Declaration in support of (i) the Motion for Final Approval of Settlement, and (ii) the forthcoming Motion for Attorneys' Fees. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. I had a digital subscription to the *Boston Globe*, a Facebook account, and I viewed videos on *Boston Globe's* website between February 5, 2020 and May 25, 2023.

3. I assisted with the litigation of this case by detailing my digital subscription, my Facebook membership, and my video viewing behavior. Specifically, I described to my lawyers how I subscribed to the *Boston Globe*, how I registered for Facebook, and how I would watch

videos on the *Boston Globe* website. I also informed my counsel that I did not agree in writing or otherwise to allow Defendant to disclose my personally identifiable information to Facebook, that I did not receive notice of such disclosures, and that I was unaware of such disclosures entirely.

4. I also worked with my attorneys to prepare the Class Action Complaint and the First Amended Class Action Complaint. I carefully reviewed the Complaints for accuracy and approved them before they were filed.

5. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, document discovery, preparation for deposition discovery, mediation, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

6. I also coordinated with my lawyers to search for documents that Defendant requested in formal discovery. I was also prepared to testify at deposition and trial, if necessary.

7. My lawyers have kept me well informed in regard to the efforts to resolve this matter. I discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.

8. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Settlement Class and will continue to do so.

9. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done my best to protect the interests of other Settlement Class Members and will continue to fairly and

adequately represent the Settlement Class to the best of my ability.

I declare under penalty of perjury that the above and foregoing is true and accurate.

Executed this ____ day of July 2023 at Irvine, California.

David Ambrose Jul 26, 2023
David Ambrose (Jul 26, 2023 09:52 PDT)
David Ambrose